

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

J.K.J.,

Plaintiff,

v.

Case No. 15-CV-428-wmc

POLK COUNTY and DARRYL L.
CHRISTENSEN,

Defendants.

and

M.J.J.,

Plaintiff,

v.

Case No. 15-CV-433-wmc

POLK COUNTY and DARRYL L.
CHRISTENSEN,

Defendants.

MARCH 6, 2018 DECLARATION OF PAUL D. CRANLEY

I, Paul D. Cranley, pursuant to 28 U.S.C. § 1746, state and declare as follows:

1. I am an adult resident of the State of Wisconsin and an attorney with the law firm of Husch Blackwell, LLP with an address of 33 East Main Street, Suite 300, Madison, Wisconsin, 53701.

2. I am one of the attorneys for Polk County in the above-captioned matter.

3. I make this Declaration in support of Defendant Polk County's Brief in Opposition to Plaintiff's Motion to Alter or Amend the Judgment to Add Prejudgment Interest.

4. Attached are true and correct copies of the following documents:

EXHIBIT A: Summary Charts: (1) Prime Rates Over Time; (2) Average Prime Rate; and (3) Annual Compounded Interest.

EXHIBIT B: Compound Interest Calculator and Calculation Results from The Calculator Site, *Compound Interest Calculator* (March 6, 2018), <https://www.thecalculatorsite.com/finance/calculators/compoundinterestcalculator.php>.

5. I verified the historical prime interest rates on JP Morgan Chase & Co.'s website:

<https://www.jpmorganchase.com/corporate/About-JPMC/historical-prime-rate.htm>.

6. I used the same website as Attorney Bannick to calculate annual compound prejudgment interest: The Calculator Site, *Compound Interest Calculator* (March 6, 2018), <https://www.thecalculatorsite.com/finance/calculators/compoundinterestcalculator.php>.

7. Based on the information and calculations shown on Exhibits A and B, the total interest, compounded annually, from October 29, 2014 through May 4, 2017, is \$197,862.71 on each \$2,000,000 verdict against Polk County.

Dated this 6th day of March, 2018.

s/ Paul D. Cranley

Paul D. Cranley

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